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1 Peter Strojnik,  
 2 2375 East Camelback Road Suite 600  
 3 Phoenix, Arizona 85016  
 4 Telephone: (602) 524-6602  
 5 ps@strojnik.com

6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF OREGON**

Case No: 3:18-CV-1869-SB

8 Peter Strojnik,

**VERIFIED COMPLAINT**

9 Plaintiff,

1. **Americans with Disabilities Act**

2. **Discrimination in Public Accommodations (State Law)**

3. **Negligence**

11 vs.

12 Provenance Fund Acquisition, LLC dba  
 13 Sentinel Hotel

**JURY TRIAL REQUESTED**

14 Defendant.

16 1. Plaintiff brings this action pursuant to the (1) Americans with Disabilities Act, 42  
 17 U.S.C. §12101 *et seq.* and corresponding regulations, 28 CFR Part 36 and Department  
 18 of Justice Standards for Accessible Design ("ADA"), (2) Oregon revised statutes, §§  
 19 659A103 *et seq.* ("ORS") and (3) common law of negligence per se.

20 **PARTIES**

21 2. Plaintiff Peter Strojnik is a veteran and a disabled person as defined by the ADA and  
 22 ORS.

23 3. Plaintiff is a single man currently residing in Maricopa County, Arizona. Plaintiff is  
 24 and, at all times relevant hereto has been, legally disabled by virtue of a severe right-  
 25 sided neural foraminal stenosis with symptoms of femoral neuropathy, prostate cancer  
 26 and renal cancer, degenerative right knee and is therefore a member of a protected  
 27 class under the ADA and ORS.  
 28

80536

- 1 4. Plaintiff suffers from physical impairments described above which impairments
- 2 substantially limit his major life activities. Plaintiff walks with difficulty and pain
- 3 and requires compliant mobility accessible features at places of public
- 4 accommodation. Plaintiff's impairment is constant, but the degree of pain is episodic
- 5 ranging from dull and numbing pain to extreme and excruciating agony.
- 6 5. Defendant, owns, operates leases or leases to a lodging business ("Hotel") located at
- 7 614 SW 11<sup>th</sup> Avenue, Portland, OR 97205 which is a public accommodation pursuant
- 8 to 42 U.S.C. § 12181(7)(A) and ORS which offers public lodging services *See* 28
- 9 CFR §36.104 and a listing of public accommodations in 42 U.S.C. §12181(7) and
- 10 ORS.

### JURISDICTION

- 11 6. District Court has jurisdiction over this case or controversy by virtue of 28 U.S.C. §§
- 12 28-1331 and 42 U.S.C. § 12188 and 28 U.S.C. § 1367.
- 13 7. Plaintiff brings this action as a private attorney general who has been personally
- 14 subjected to discrimination on the basis of his disability, *see* 42 U.S.C. §12188 and
- 15 28 CFR §36.501.
- 16 8. This Court has continuing subject matter jurisdiction by virtue of, *inter alia*,
- 17 Plaintiff's claim for equitable nominal damages.
- 18 9. Venue is proper pursuant to 28 U.S.C. § 1391.
- 19 10. The ADAAG violations in this Verified Complaint relate to barriers to Plaintiffs
- 20 mobility. This impairs Plaintiff's full and equal access to the Hotel which, in turn,
- 21 constitutes discrimination satisfying the "injury in fact" requirement of Article III of
- 22 the United States Constitution.
- 23 11. Plaintiff is deterred from visiting the Hotel based on Plaintiff's knowledge that the
- 24 Hotel is not ADA or ORS compliant as such compliance relates to Plaintiff's
- 25 disability.
- 26 12. Plaintiff intends to visit Defendant's Hotel at a specific time when the Defendant's
- 27 noncompliant Hotel becomes fully compliant with ADAAG; just as a disabled
- 28 individual who intends to return to a noncompliant facility suffers an imminent injury
- from the facility's existing or imminently threatened noncompliance with the ADA, a

1 plaintiff who is deterred from patronizing a store suffers the ongoing actual injury of  
2 lack of access to the Hotel.

### 3 **COUNT ONE**

#### 4 Violation of Plaintiff's Civil Rights under the ADA

5 13. Plaintiff realleges all allegations heretofore set forth.

6 14. By virtue of his disability, Plaintiff requires an ADA compliant lodging facility  
7 particularly applicable to his mobility, both ambulatory and wheelchair assisted.

8 15. Plaintiff intended to vacation in Oregon and therefore, reviewed vacation booking  
9 websites as documented in Addendum A which is incorporated herein for all  
10 purposes.

11 16. Air booking websites took Plaintiff to third party hotel booking websites as  
12 documented in Addendum A.

13 17. Plaintiff became aware that third party booking websites disclosed general availability  
14 and description of Defendant's Hotel. Third Party booking websites referenced here  
15 are more fully documented in Addendum A which is by this reference incorporated  
16 herein.

17 18. Third party booking websites failed to identify and describe mobility related  
18 accessibility features and guest rooms offered through its reservations service in  
19 enough detail to reasonably permit Plaintiff to assess independently whether  
20 Defendant's Hotel meets his accessibility needs as more fully documented in  
21 Addendum A.

22 19. Third party booking websites also failed to make reservations for accessible guest  
23 rooms available in the same manner as individuals who do not need accessible rooms.  
24 *See Addendum A.*

25 20. Thereafter, Plaintiff became aware that Defendant's 1<sup>st</sup> party booking website failed  
26 to identify and describe mobility related accessibility features and guest rooms offered  
27 through its reservations service in enough detail to reasonably permit Plaintiff to  
28 assess independently whether Defendant's Hotel meets his accessibility needs as more  
fully documented. *See Addendum A.*

1 21. Plaintiff also became aware that Defendant's 1<sup>st</sup> party booking website failed to make  
2 reservations for accessible guest rooms available in the same manner as individuals  
3 who do not need accessible rooms. *See* Addendum A.

4 22. Because third and first party booking agents failed to identify and describe mobility  
5 related accessibility features and guest rooms offered through its reservations service  
6 in enough detail to reasonably permit Plaintiff to assess independently whether  
7 Defendant's Hotel meets his accessibility needs Plaintiff declined to book a room  
8 there and because Plaintiff was unable to make reservations for accessible guest  
9 rooms available in the same manner as individuals who do not need accessible rooms,  
10 Plaintiff declined to book a room there.

11 23. Plaintiff thereafter reviewed Defendant's online information relating to accessibility  
12 or lack thereof, including in particular photographs of the amenities at the Hotel all as  
13 more fully documented in Addendum A.

14 24. Online information relating to accessibility or lack thereof disclosed Defendant's non-  
15 compliance with architectural barriers to accessibility as more fully documented in  
16 Addendum A.

17 25. Defendant has violated the ADA by denying Plaintiff equal access to its public  
18 accommodation on the basis of his disability as outlined above and as outlined in  
19 Addendum A.

20 26. The ADA violations described in Addendum A relate to Plaintiff's disability and  
21 interfere with Plaintiff's full and complete enjoyment of the Hotel.

22 27. As a result of the deficiencies described above, Plaintiff declined to book a room at  
23 Defendant's Hotel and did no travel to Oregon to vacation there.

24 28. The removal of accessibility barriers listed above is readily achievable.

25 29. As a direct and proximate result of ADA Violations, Defendant's failure to remove  
26 accessibility barriers prevented Plaintiff from equal access to the Defendant's public  
27 accommodation.

28 **WHEREFORE**, Plaintiff prays for all relief as follows:

A. Relief described in 42 U.S.C. §2000a – 3; and

B. Relief described in 42 U.S.C. § 12188(a) and (b) and, particularly -

- C. Injunctive relief order to alter Defendant's place of public accommodation to make it readily accessible to and usable by ALL individuals with disabilities; and
- D. Requiring the provision of an auxiliary aid or service, modification of a policy, or provision of alternative methods, to the extent required by Subchapter III of the ADA; and
- E. Equitable nominal damages; and
- F. For costs, expenses and attorney's fees; and
- G. All remedies provided for in 28 C.F.R. 36.501(a) and (b).

**COUNT TWO**  
**(Violation of ORS §§659.103 *et seq*)**

30. Plaintiff realleges all allegations heretofore set forth.

31. Defendant has violated Oregon law by denying Plaintiff equal access to its public accommodation on the basis of his disability as outlined above and in Addendum A.

32. Plaintiff has been injured by the unlawful discriminatory practices alleged in this Complaint.

33. Pursuant to ORS, including §§ 659A.885, Plaintiff is entitled to -

- a. injunctive and other equitable relief; and
- b. damages sustained in the amount of \$200; and
- c. punitive damages.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- a. A Declaratory Judgment that at the commencement of this action Defendant was in violation of the specific requirements of the statute; and
- d. A permanent injunction which directs Defendant to take all steps necessary to bring its Hotel into full compliance with the requirements set forth in ORS, and its implementing regulations, so that the facilities are fully accessible to, and independently usable by, disabled individuals as required by law, and which further directs that the Court shall retain jurisdiction for a period to be determined

1 after Defendant certifies that its facilities are fully in compliance with the relevant  
 2 requirements of the Statutes to ensure that Defendant has adopted and is following  
 3 an institutional policy that will in fact cause Defendant to remain fully in  
 4 compliance with the law; and

5 e. Damages in the amount of \$200.00 per violation; and

6 f. Punitive damages in an amount to be proven at trial; and

7 g. The payment of costs of suit; and

8 h. Order closure of the Defendant's Hotel until Defendant has fully complied with  
 9 the ADA and ORS; and

10 i. The provision of whatever other relief the Court deems just, equitable and  
 11 appropriate.

### 12 **COUNT THREE**

#### 13 Negligence

14 34. Plaintiff realleges all allegations heretofore set forth.

15 35. Defendant had a duty to Plaintiff to remove ADA and ORS accessibility barriers so  
 16 that Plaintiff as a disabled individual would have full and equal access to the Hotel.

17 36. Defendant breached this duty.

18 37. Defendant's knowing and intentional discrimination against Plaintiff reinforces above  
 19 forms of discrimination, causing Plaintiff damage.

20 38. Defendant's knowing and intentional discrimination has relegated Plaintiff to an  
 21 inferior status in society, causing Plaintiff damage.

22 39. Defendant's knowing and intentional unfair and unnecessary discrimination against  
 23 Plaintiff demonstrates Defendant's knowing and intentional damage to Plaintiff.

24 40. Defendant's breach of duty caused Plaintiff damages including, without limitation,  
 25 the feeling of segregation, discrimination, relegation to second class citizen status the  
 26 pain, suffering and emotional damages inherent to discrimination and segregation and  
 27 other damages to be proven at trial.

28 41. By violating Plaintiff's civil rights, Defendant engaged in intentional, aggravated and  
 outrageous conduct.

1 42. The ADA has been the law of the land since 1991, but Defendant engaged in a  
2 conscious action of a reprehensible character, that is, Defendant denied Plaintiff his  
3 civil rights, and cause him damage by virtue of segregation, discrimination, relegation  
4 to second class citizen status the pain, suffering and emotional damages inherent to  
5 discrimination and segregation and other damages to be proven at trial

6 43. Defendant either intended to cause injury to Plaintiff or defendant consciously  
7 pursued a course of conduct knowing that it created a substantial risk of significant  
8 harm to Plaintiff.

9 44. Defendant is liable to Plaintiff for punitive damages in an amount to be proven at trial  
10 sufficient, however, to deter this Defendant and others similarly situated from  
11 pursuing similar acts.

12 **WHEREFORE**, Plaintiff prays for relief as follows:

- 13 A. For finding of negligence; and  
14 B. For damages in an amount to be proven at trial; and  
15 C. For punitive damages to be proven at trial; and  
16 D. For such other and further relief as the Court may deem just and proper.

17 **REQUEST FOR TRIAL BY JURY**

18 Plaintiff respectfully requests a trial by jury in issues triable by a jury.

19 **VERIFICATION**

20 I declare under penalty of perjury that the foregoing is true and correct to the best  
21 of my knowledge, information and/or belief.

22 RESPECTFULLY SUBMITTED this <sup>23<sup>rd</sup></sup>~~21<sup>st</sup>~~ day of October, 2018.

23 **PETER STROJNIK**


24   
25 Plaintiff  
26  
27  
28



## ADDENDUM A

**ADA VIOLATIONS**

**3<sup>RD</sup> PARTY BOOKING WEBSITE - EXPEDIA.COM**



**Sentinel** ★★★★★ Top Property

Downtown Portland

1-866-264-5744 • Expedia Rate

✓ Free Cancellation

8 people booked this property in the last 48 hours

4.5/5 Wonderful!  
(1,710 reviews)

We have 4 left at

**\$326-\$261**

nightly price

**Sale**

Hurry! Offer ends soon


✓ Reserve now, pay when you stay

**Accessibility**

If you have requests for specific accessibility needs, please note them at check-out when you book your room.

- Accessible bathroom
- In-room accessibility
- Roll-in shower

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.



**Deluxe Room, 1 Queen Bed (Accessible)**

1 Queen Bed

(Extra beds available: Crib)

Room sleeps 2 guests (up to 1 child)

- ✓ Free Cancellation until Tue, Oct 2
- ✓ Reserve now, pay when you stay
- ✓ Free Internet
- ✓ No Expedia booking or credit card fees

Recommended for you

We have 1 room left

~~\$256~~ **\$205**

Excludes required resort fee: \$23.06 per night





**Sale**

**Reserve**




It only takes 2 minutes

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.


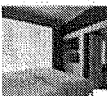



	<p><b>Deluxe Room, 1 Queen Bed</b> 4.85 guest room score 230 square feet 1 Queen Bed (Extra beds available: Crib) Room sleeps 2 guests (up to 1 child)</p> <p><a href="#">More details</a></p>	<ul style="list-style-type: none"> <li>✓ Free Cancellation until Tue, Oct 2</li> <li>✓ Reserve now, pay when you stay</li> <li>✓ Free internet</li> <li>✓ No Expedia booking or credit card fees</li> </ul>	<p>We have 5 rooms left <del>\$256</del> <b>\$205</b> Excludes required resort fee: \$23.06 per night</p> <p><b>Reserve</b> It only takes 2 minutes</p>
	<p>Room cleanliness: exceptional! 4.7</p> <p>1 Queen Bed 230 sq feet (21 sq meters)</p> <p>Relax - In-room massage available Internet - Free WiFi Entertainment - Flat-screen TV, premium channels, and iPod dock Food &amp; Drink - Coffee/tea maker, minibar, and 24-hour room service Sleep - Pillowtop bed, Frette Italian linens, a pillow menu, and blackout drapes/curtains Bathroom - Private bathroom, shower/tub combination, bathrobes, and designer toiletries Practical - Laptop-compatible safe, iron/ironing board, and desk; free crib/infant beds available on request Comfort - Air conditioning and daily housekeeping Need to Know - No rollaway/extra beds available Non-Smoking, pet friendly Connecting/adjoining rooms can be requested, subject to availability</p> <p>Close x</p>	<p>Cancellation: Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees</p>	<p>We have 1 room left <del>\$256</del> <b>\$205</b> Excludes required resort fee: \$23.06 per night</p> <p><b>Reserve</b> It only takes 2 minutes</p>
	<p>Cancellation: Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees</p>	<p><del>\$276</del> <b>\$221</b> Excludes required resort fee: \$23.06 per night</p> <p><b>Reserve</b> It only takes 2 minutes</p>	
	<p>Cancellation: Tue, Oct 2</p>	<p>We have 2 rooms left <del>\$336</del> <b>\$280</b></p>	<p><b>Reserve</b></p>




**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs

	<p><b>Deluxe Room, 1 Queen Bed (Accessible Roll-In Shower)</b> 1 Queen Bed (Extra beds available: Crib) Room sleeps 2 guests (up to 1 child)</p> <p><a href="#">More details</a></p>	<ul style="list-style-type: none"> <li>✓ Free Cancellation until Tue, Oct 2</li> <li>✓ Reserve now, pay when you stay</li> <li>✓ Free internet</li> <li>✓ No Expedia booking or credit card fees</li> </ul>	<p>We have 1 room left <del>\$256</del> <b>\$205</b> Excludes required resort fee: \$23.06 per night</p> <p><b>Reserve</b> It only takes 2 minutes</p>
	<p>Room cleanliness: exceptional! 4.7</p> <p>1 Queen Bed Relax - In-room massage available Internet - Free WiFi Entertainment - Flat-screen TV, premium channels, and iPod dock Food &amp; Drink - Coffee/tea maker, minibar, and 24-hour room service Sleep - Pillowtop bed, Frette Italian linens, a pillow menu, and blackout drapes/curtains Bathroom - Private bathroom, shower/tub combination, bathrobes, and designer toiletries Practical - Laptop-compatible safe, iron/ironing board, and desk; free crib/infant beds available on request Comfort - Air conditioning and daily housekeeping Accessibility - Wheelchair accessible Non-Smoking Connecting/adjoining rooms can be requested, subject to availability</p> <p>Close x</p>	<p>Cancellation: Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees</p>	<p><del>\$276</del> <b>\$221</b> Excludes required resort fee: \$23.06 per night</p> <p><b>Reserve</b> It only takes 2 minutes</p>
	<p>Cancellation: Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees</p>	<p>We have 2 rooms left <del>\$336</del> <b>\$269</b> Excludes required resort fee: \$23.06 per night</p>	<p><b>Reserve</b> It only takes 2 minutes</p>

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs

	<b>Deluxe Room, 1 King Bed</b> 5.00 guest room score 230 square feet 1 King Bed (Extra beds available: Crib) Room sleeps 2 guests (up to 1 child) <a href="#">More details</a>	<ul style="list-style-type: none"> <li>✓ Free Cancellation until Tue, Oct 2</li> <li>✓ Reserve now, pay when you stay</li> <li>✓ Free Internet</li> <li>✓ No Expedia booking or credit card fees</li> </ul>	<del>\$276</del> <b>\$221</b> Excludes required resort fee: \$23.06 per night <b>Sale</b>	<b>Reserve</b> It only takes 2 minutes
	<b>Room cleanliness: exceptional 4.7</b> 1 King Bed 230 sq feet (21 sq meters) Relax - In-room massage available Internet - Free WiFi Entertainment - Flat-screen TV, premium channels, and iPod dock Food & Drink - Coffee/tea maker, minibar, and 24-hour room service Sleep - Pillowtop bed, Frette Italian linens, a pillow menu, and blackout drapes/curtains Bathroom - Private bathroom, shower/tub combination, bathrobes, and designer toiletries Practical - Laptop-compatible safe, iron/ironing board, and desk; free cribs/infant beds available on request Comfort - Air conditioning and daily housekeeping Need to Know - No rollaway/extra beds available Non-Smoking, pet friendly Connecting/adjoining rooms can be requested, subject to availability Close x	<b>Cancellation</b> Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees	We have 2 rooms left <del>\$336</del> <b>\$269</b> Excludes required resort fee: \$23.06 per night <b>Sale</b>	<b>Reserve</b> It only takes 2 minutes
	<b>Cancellation</b> Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees	We have 2 rooms left <del>\$556</del> <b>\$445</b> Excludes required resort fee: \$23.06 per night <b>Sale</b>	<b>Reserve</b> It only takes 2 minutes	

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs

	<b>Suite, 1 King Bed (Parlor)</b> <b>Room with view</b> 450 square feet 1 King Bed (Extra beds available: Crib) Room sleeps 2 guests (up to 1 child) <a href="#">More details</a>	<ul style="list-style-type: none"> <li>✓ Free Cancellation until Tue, Oct 2</li> <li>✓ Reserve now, pay when you stay</li> <li>✓ Free Internet</li> <li>✓ No Expedia booking or credit card fees</li> </ul>	We have 2 rooms left <del>\$336</del> <b>\$269</b> Excludes required resort fee: \$23.06 per night <b>Sale</b>	<b>Reserve</b> It only takes 2 minutes
	<b>Room cleanliness: exceptional 4.7</b> 1 King Bed 450-sq-foot (42-sq-meter) room with city views Layout - Separate sitting area Relax - In-room massage available Internet - Free WiFi Entertainment - Flat-screen TV, premium channels, and iPod dock Food & Drink - Coffee/tea maker, minibar, and 24-hour room service Sleep - Pillowtop bed, Frette Italian linens, a pillow menu, blackout drapes/curtains, and turn-down service Bathroom - Private bathroom, shower/tub combination, bathrobes, and slippers Practical - Sofa bed, laptop-compatible safe, and iron/ironing board; rollaway/extra beds and free cribs/infant beds available on request Comfort - Air conditioning and daily housekeeping Non-Smoking, pet friendly Connecting/adjoining rooms can be requested, subject to availability Close x	<b>Cancellation</b> Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees	We have 2 rooms left <del>\$556</del> <b>\$445</b> Excludes required resort fee: \$23.06 per night <b>Sale</b>	<b>Reserve</b> It only takes 2 minutes
	<b>Cancellation</b> Tue, Oct 2 Reserve now, pay when you stay Internet Expedia booking or credit fees	We have 3 rooms left <del>\$556</del> <b>\$445</b> Excludes required resort fee: \$23.06 per night <b>Sale</b>	<b>Reserve</b> It only takes 2 minutes	

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



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**Room cleanliness: exceptional! 4.7**

**1 King Bed**  
450-sq-foot (42-sq-meter) room, balcony with city views

**Executive Level - Executive Lounge access**  
Relax - In-room massage available  
Internet - Free WiFi  
Entertainment - Flat-screen TV, premium channels, and iPod dock  
Food & Drink - Coffee/tea maker, minibar, and 24-hour room service  
Sleep - Pillowtop bed, Frette Italian linens, a pillow menu, blackout drapes/curtains, and turndown service  
**Bathroom - Private bathroom, shower/tub combination, bathrobes, and slippers**  
Practical - Laptop-compatible safe, iron/ironing board, and desk; free crib/infant beds available on request  
Comfort - Air conditioning and daily housekeeping  
Need to Know - No rollaway/extra beds available  
Non-Smoking, pet friendly  
Connecting/adjoining rooms can be requested, subject to availability

**Cancellation**  
Tue, Oct 2  
Reserve now, pay when you stay

**Internet**  
Expedia booking or credit card fees

We have 3 rooms left  
~~\$556~~ **\$445**  
Excludes required resort fee: \$23.06 per night  
**Sale**

**Reserve**  
It only takes 2 minutes

**More Great Choices**

**The Duniway Port**  
★★★★★  
Wonderful! 4.8/5

**land Airport**  
\$429 \$87  
Sponsored

**Portland Marriott Downtown Waterfr...**  
★★★★★  
Very good! 4.3/5  
Sponsored

**Hilton Garden Inn L**  
★★★★★  
Excellent! 4.4/5



**Suite, 1 King Bed (Bridgetown Parlor)**  
**Room with view**  
550 square feet  
1 King Bed  
(Extra beds available: Crib)  
Room sleeps 2 guests  
(up to 1 child)  
[More details](#)

**Free Cancellation**  
until Tue, Oct 2  
**Reserve now, pay when you stay**  
**Free Internet**  
**No Expedia booking or credit card fees**

We have 3 rooms left  
~~\$556~~ **\$445**  
Excludes required resort fee: \$23.06 per night  
**Sale**

**Reserve**  
It only takes 2 minutes

**More Great Choices**

**The Duniway Port**  
★★★★★  
Wonderful! 4.5/5

**land Airport**  
\$429 \$87  
Sponsored

**Portland Marriott Downtown Waterfr...**  
★★★★★  
Very good! 4.3/5  
Sponsored

**Hilton Garden Inn Lak**  
★★★★★  
Excellent! 4.4/5

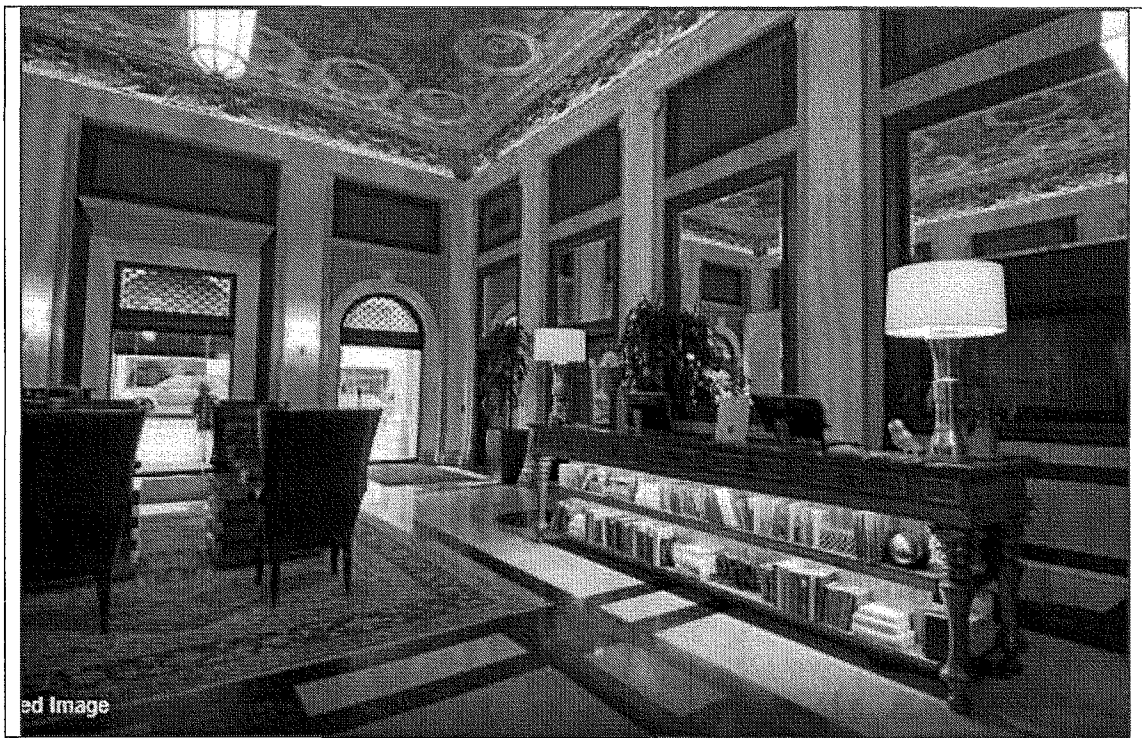
**Get price alert**

Historic, Northwest-style in downtown Portland

Popular property highlights

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



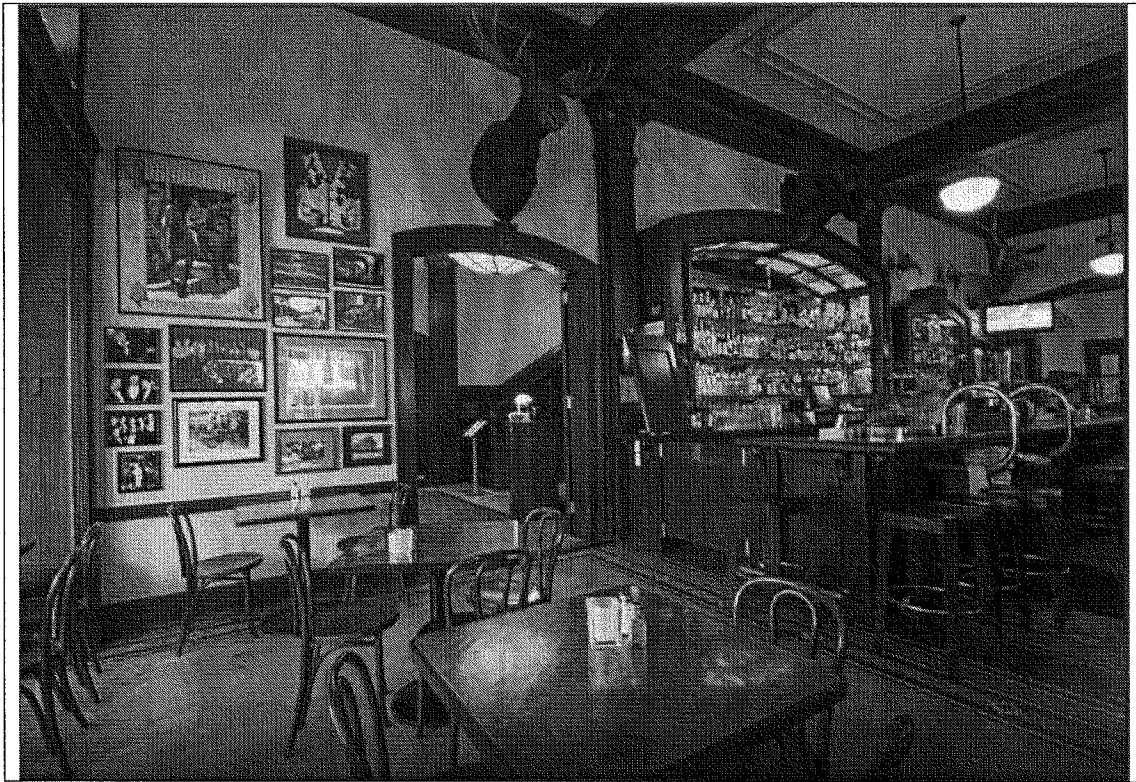


**ADA Deficiency:**



**ADA Deficiency:** No ADA deficiency but apparent accesibility to *dogs*.



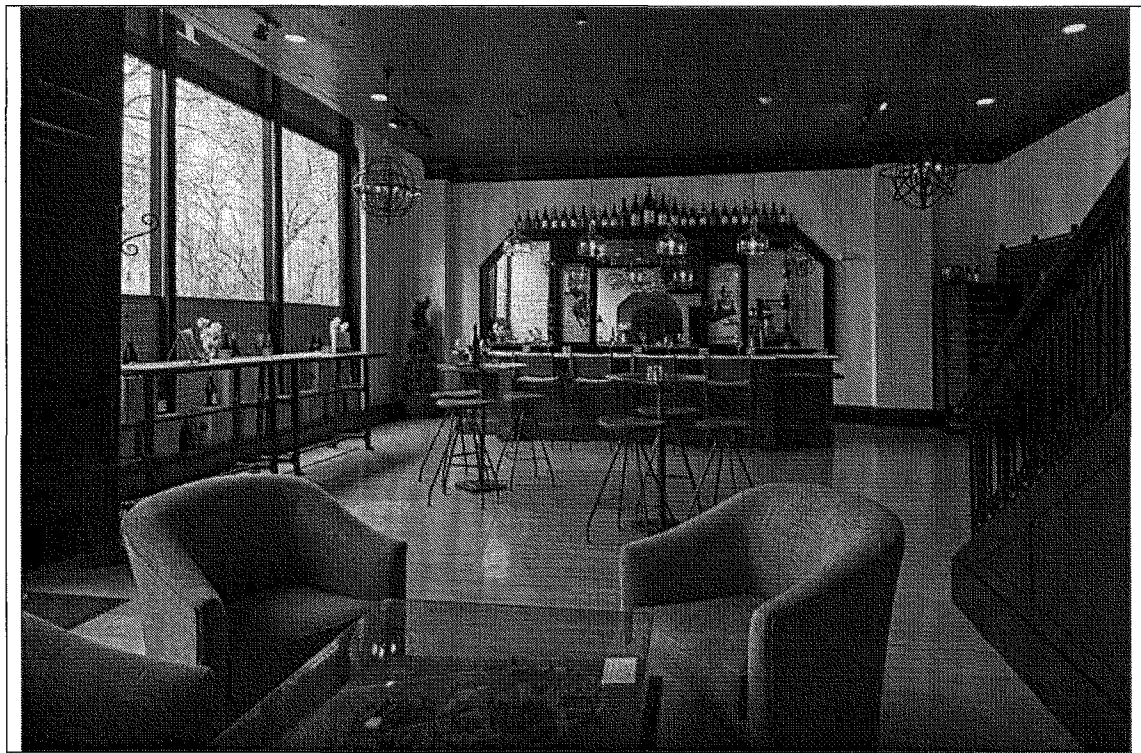


**ADA Deficiency: Inaccessible bar.**



**ADA Deficiency: Inaccessible bar.**

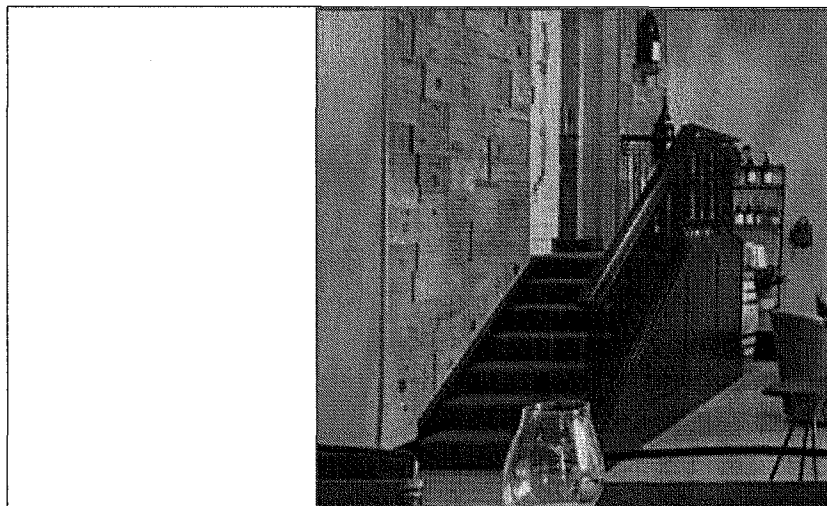




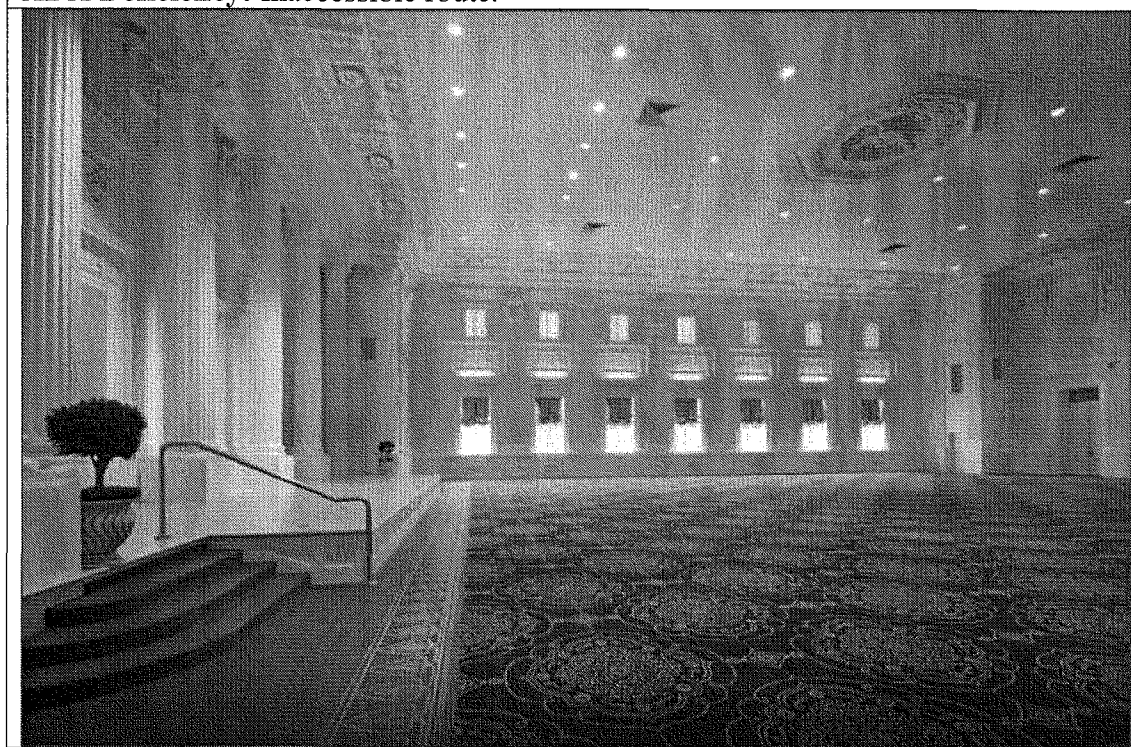
**ADA Deficiency: Inaccessible hotel bar.**





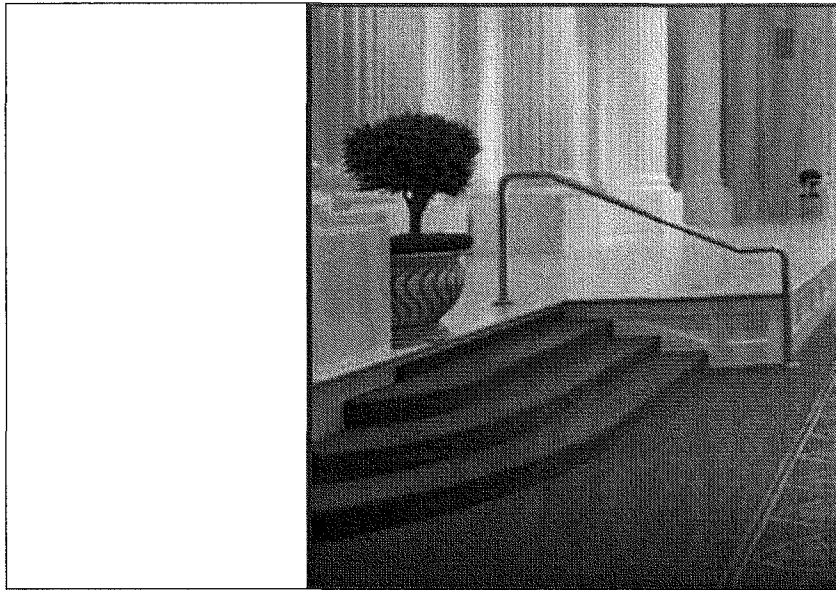


**ADA Deficiency: Inaccessible route.**





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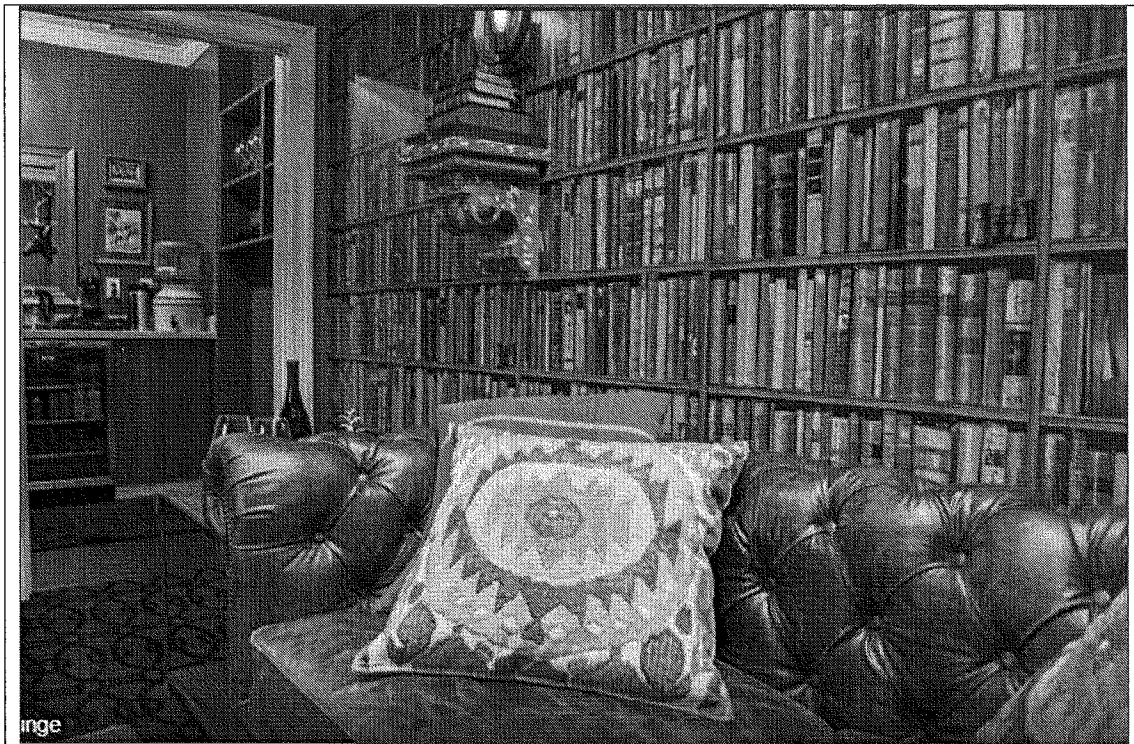


**ADA Deficiency: (1) Inaccessible route to -from ballroom, (2) Improperly configured handrails.**



**ADA Deficiency: Inaccessible executive lounge.**





**ADA Deficiency:** Inaccessible snack bar.

**1<sup>ST</sup> PARTY BOOKING WEBSITE**

[www.sentinelhotel.com](http://www.sentinelhotel.com)

[www.sentinelhotel.reservations.com](http://www.sentinelhotel.reservations.com)

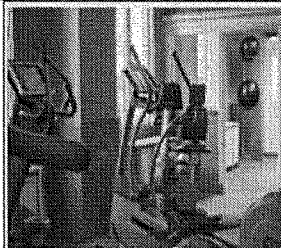
**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs

## FEATURED AMENITIES



- 24-hour business center
- 24-hour front desk
- Accessible bathroom
- Breakfast available (surcharge)
- Coffee shop or café
- Concierge services
- Conference center
- Conference space
- Conference space size (feet) - 22000
- Conference space size (meters) - 2044
- Dry cleaning/laundry service
- Elevator/lift
- Fitness facilities
- Free WiFi
- Free newspapers in lobby
- In-room accessibility
- Limo or Town Car service available
- Luggage storage
- Meeting rooms - 9
- Number of bars/lounges - 2
- Number of buildings/towers - 2
- Number of floors - 6
- Pets allowed
- Porter/bellhop
- Restaurant
- Roll-in shower
- Smoke-free property
- Terrace
- Total number of rooms - 100
- Valet parking (surcharge)
- Wedding services
- Year Built - 1909

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



### DELUXE KING ROOM - FREE INTERNET IN ROOM - FRIDGE

☒ View room details, amenities & policies

**\$248** / night

**RESERVE**

Hurry, reserve offer!

Deluxe King Room - Free Internet In Room - Fridge - iPod docking station, in room safe, alarm clock, ironing facilities, refrigerator, hair dryer, desk, Free Premium Wifi, toiletries, bathrobes, flat screen television, mini bar, laptop safe box, wake-up service, heating, telephone, satellite/cable TV, air conditioning

#### Amenities and Features

- Free Premium Wifi
- Free Wifi

#### Room Cancellation Policies

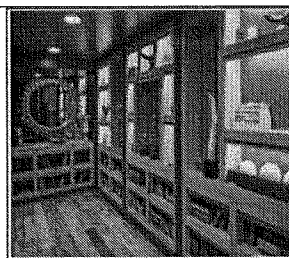
This booking is Non-Refundable and cannot be amended or modified. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

#### Payment, Loyalty and Rewards

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs





### DELUXE QUEEN ROOM - FREE INTERNET IN ROOM

☒ View room details, amenities & policies

**\$255** / night

**RESERVE**

⌚ Just 3 rooms left at this low rate!

Deluxe Queen Room - Free Internet In Room - iPod docking station, in room safe, alarm clock, ironing facilities, hair dryer, desk, toiletries, bathrobes, flat screen television, laptop safe box, mini bar, wake-up service, heating, satellite/cable TV, telephone, air conditioning

#### Amenities and Features

- Free Wifi

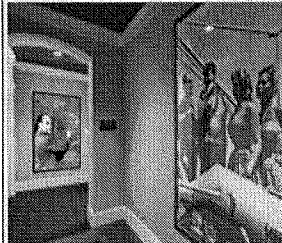
#### Room Cancellation Policies

Any cancellation received within 2 days prior to the arrival date will incur the first 2 nights' charge. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax, recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

#### Payment, Loyalty and Rewards

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



### DELUXE KING ROOM - FREE INTERNET IN ROOM - FRIDGE

☒ View room details, amenities & policies

**\$275** / night

**RESERVE**

⌚ Hurry, reserve offer!

Deluxe King Room - Free Internet In Room - Fridge - iPod docking station, in room safe, alarm clock, ironing facilities, refrigerator, hair dryer, desk, toiletries, bathrobes, flat screen television, laptop safe box, mini bar, wake-up service, heating, telephone, satellite/cable TV, air conditioning

#### Amenities and Features

- Free Wifi

#### Room Cancellation Policies

Any cancellation received within 2 days prior to the arrival date will incur the first 2 nights' charge. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax, recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

#### Payment, Loyalty and Rewards

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



**PARLOR SUITE - FREE  
INTERNET IN ROOM -  
FRIDGE**

☒ View room details, amenities & policies

**\$302** / night

**RESERVE**

⌚ Just 2 rooms left at this low rate!

Parlor Suite - Free Internet In Room - Fridge - iPod docking station, in room safe, alarm clock, ironing facilities, refrigerator, hair dryer, desk, Free Premium Wifi, toiletries, bathrobes, flat screen television, laptop safe box, mini bar, wake-up service, telephone, satellite/cable TV, air conditioning

**Amenities and Features**

- Free Premium Wifi
- Free Wifi

**Room Cancellation Policies**

This booking is Non-Refundable and cannot be amended or modified. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

**Payment, Loyalty and Rewards**

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



**PARLOR SUITE - FREE  
INTERNET IN ROOM -  
FRIDGE**

☒ View room details, amenities & policies

**\$335** / night

**RESERVE**

⌚ Just 2 rooms left at this low rate!

Parlor Suite - Free Internet In Room - Fridge - iPod docking station, in room safe, alarm clock, ironing facilities, refrigerator, hair dryer, desk, toiletries, bathrobes, flat screen television, mini bar, laptop safe box, wake-up service, telephone, satellite/cable TV, air conditioning

**Amenities and Features**

- Free Wifi

**Room Cancellation Policies**


Any cancellation received within 2 days prior to the arrival date will incur the first 2 nights' charge. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

**Payment, Loyalty and Rewards**

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs





**TERRACE STUDIO SUITE  
KING - FREE INTERNET  
IN ROOM**

☒ View room details, amenities & policies

**\$500** / night

**RESERVE**

⌚ Just 2 rooms left at this low rate!

Terrace Studio Suite King - Free Internet In Room - Free Premium Wifi

**Amenities and Features**

- Free Premium Wifi
- Free Wifi

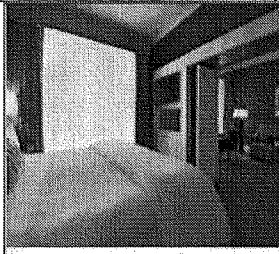
**Room Cancellation Policies**

This booking is Non-Refundable and cannot be amended or modified. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

**Payment, Loyalty and Rewards**

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



**BRIDGETOWN PARLOR  
SUITE KING - FREE  
INTERNET IN ROOM**

☒ View room details, amenities & policies

**\$500** / night

**RESERVE**

⌚ Just 3 rooms left at this low rate!

Bridgetown Parlor Suite King - Free Internet In Room - Free Premium Wifi

**Amenities and Features**

- Free Premium Wifi
- Free Wifi

**Room Cancellation Policies**

This booking is Non-Refundable and cannot be amended or modified. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

**Payment, Loyalty and Rewards**

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



### TERRACE STUDIO SUITE KING - FREE INTERNET IN ROOM

☒ View room details, amenities & policies

**\$555** / night

**RESERVE**

⌚ Just 2 rooms left at this low rate!

Terrace Studio Suite King - Free Internet In Room

#### Amenities and Features

- Free Wifi

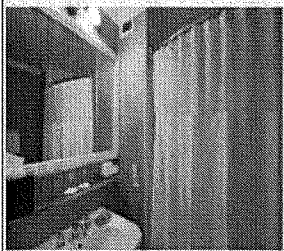
#### Room Cancellation Policies

Any cancellation received within 2 days prior to the arrival date will incur the first 2 nights' charge. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax, recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

#### Payment, Loyalty and Rewards

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs



### BRIDGETOWN PARLOR SUITE KING - FREE INTERNET IN ROOM

☒ View room details, amenities & policies

**\$555** / night

**RESERVE**

⌚ Just 3 rooms left at this low rate!

Bridgetown Parlor Suite King - Free Internet In Room

#### Amenities and Features

- Free Wifi

#### Room Cancellation Policies

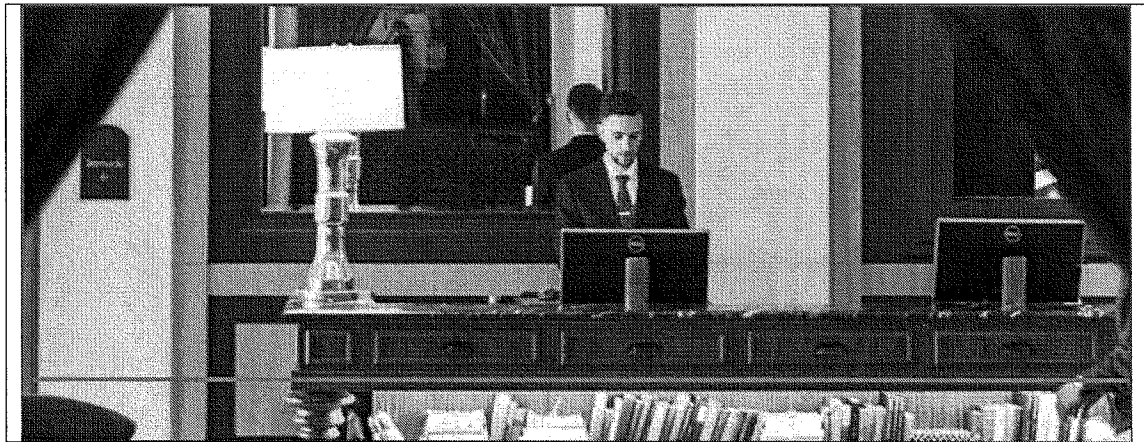
Any cancellation received within 2 days prior to the arrival date will incur the first 2 nights' charge. If you fail to arrive or cancel the booking, no refund will be given. The USD 14.99 fee from Reservations.com included in the total is non-refundable. The room rates listed are for double occupancy per room unless otherwise stated and exclude tax, recovery charges and service fees. Any partial hotel stays is subject to be charged for the full reservations amount.

#### Payment, Loyalty and Rewards

Full payment will be charged to your credit card when you book this hotel. All charges in USD. This booking is with Reservations.com and you may not be eligible for certain loyalty benefits and rewards offered by the hotel directly.

**ADA Deficiency:** Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs





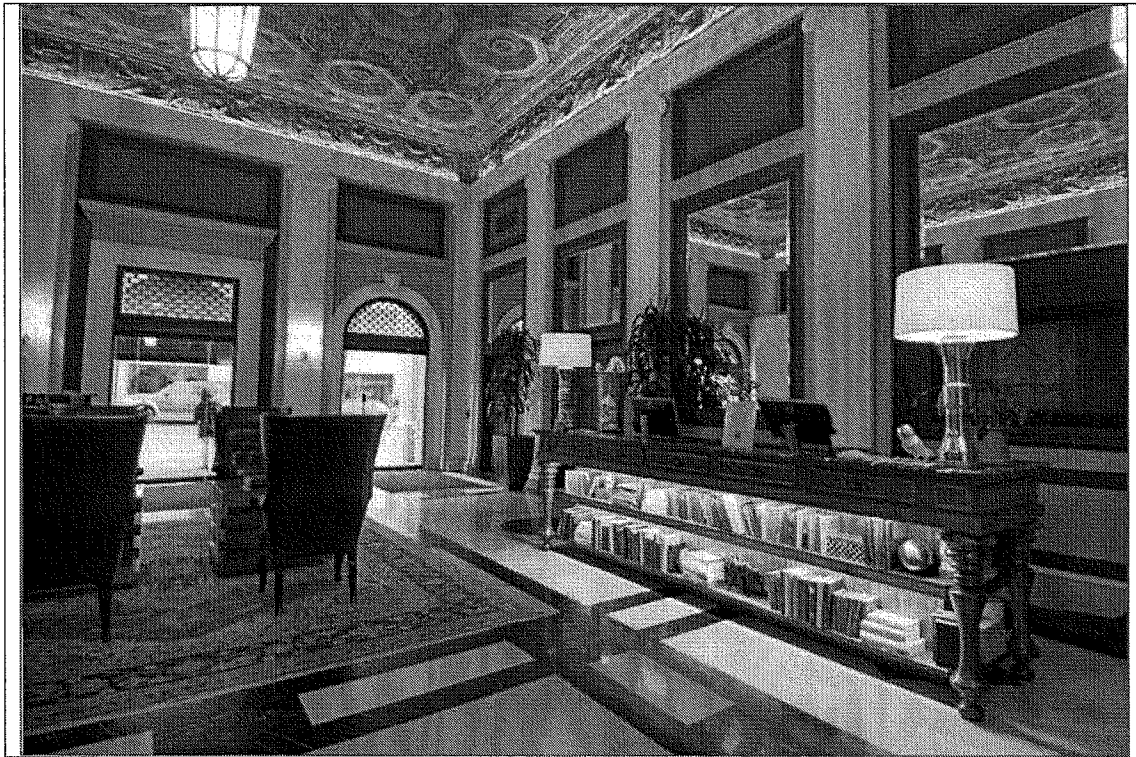
**ADA Deficiency: Inaccessible check-in counter.**



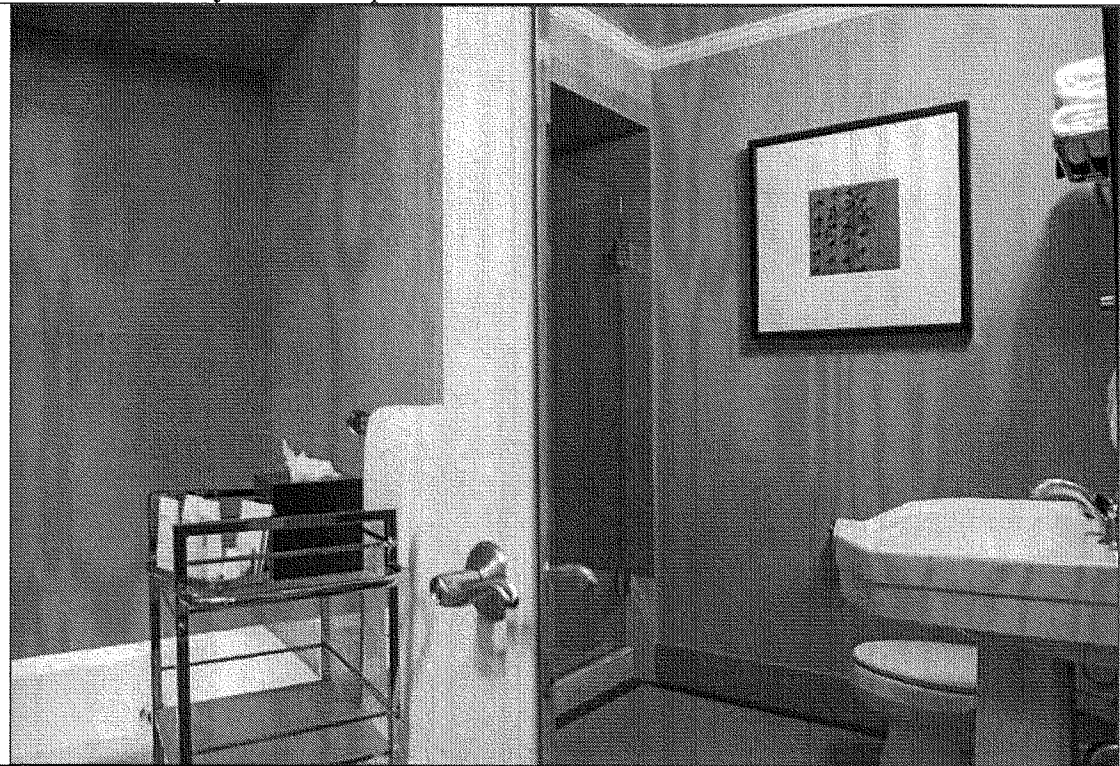
**ADA Deficiency: Inaccessible hotel bar.**

**3<sup>rd</sup> PARTY PHOTOS – GOOGLE.COM/MAPS – OYSTER.COM – ETC.**





**ADA Deficiency: Non-compliant check in counter.**

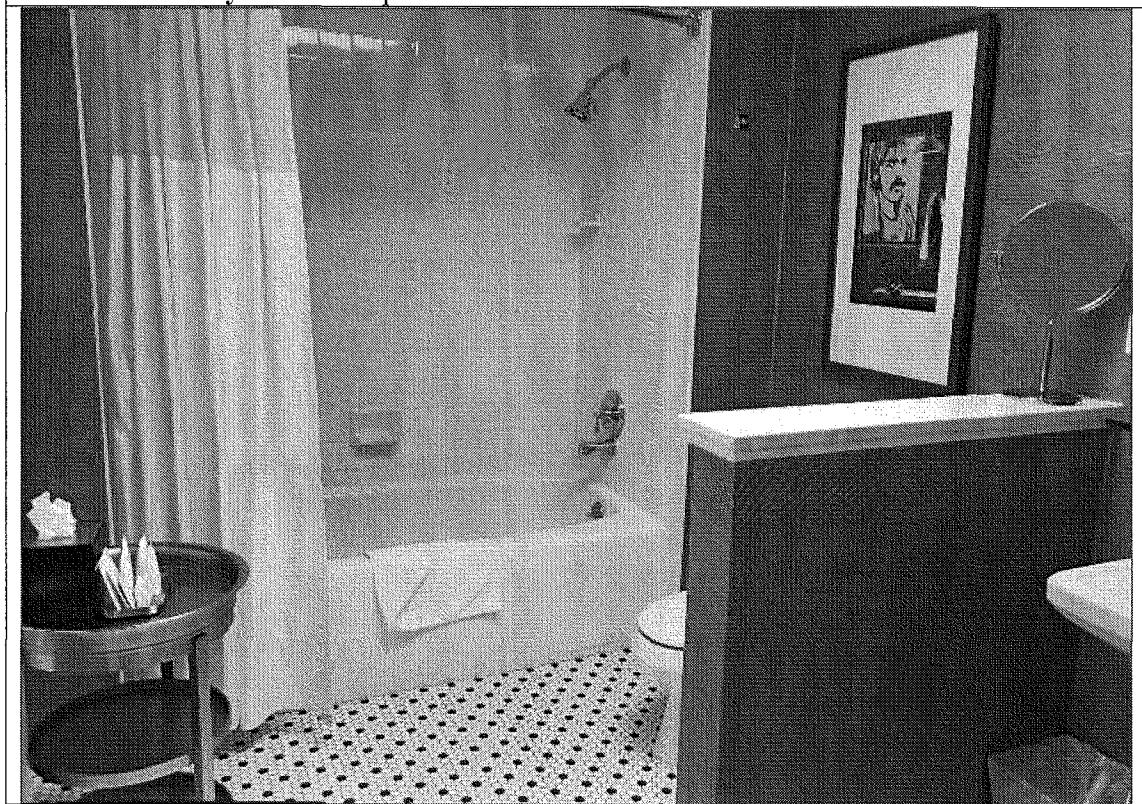


**ADA Deficiency: Non-compliant bathroom.**





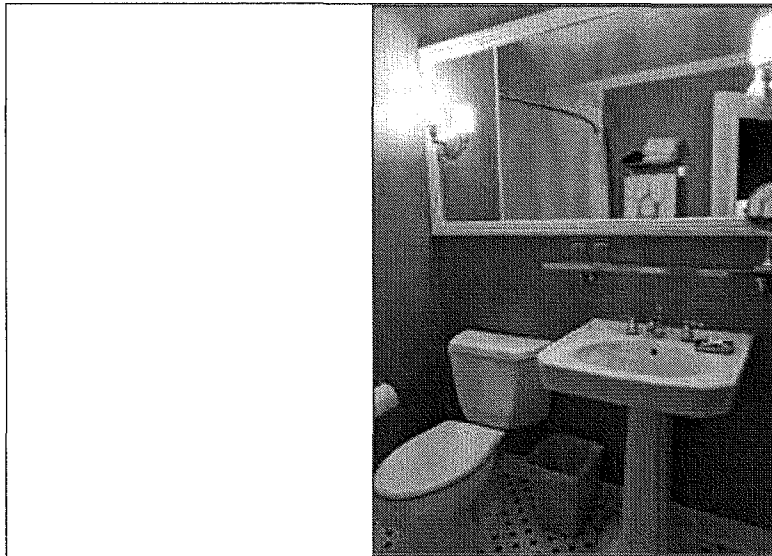
**ADA Deficiency: Non-compliant check in counter.**



**ADA Deficiency: Non-compliant bathroom.**



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**ADA Deficiency: Non-compliant bathroom.**



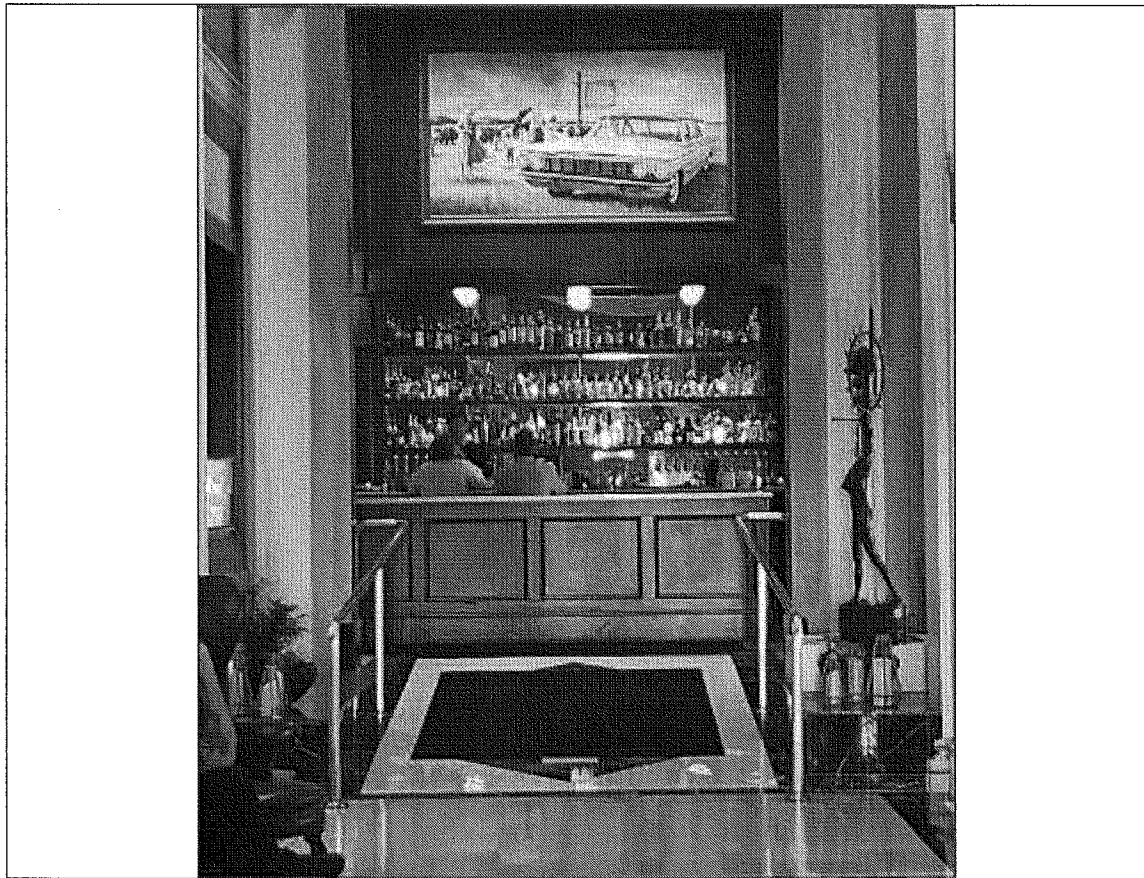
**ADA Deficiency: Non-compliant check bar counter.**



**ADA Deficiency: Non-compliant bathroom.**



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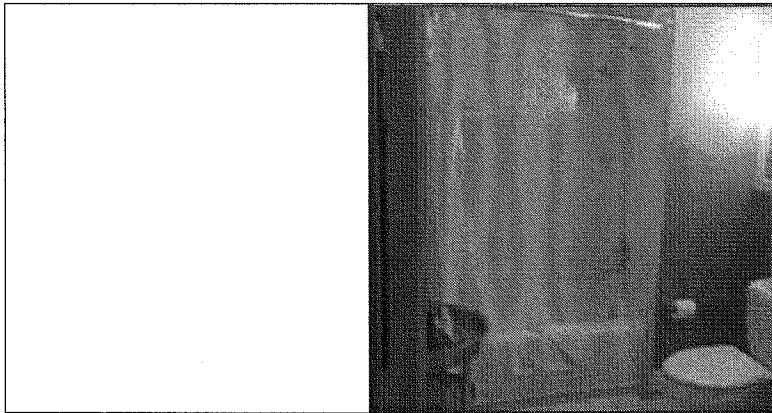


**ADA Deficiency:** (1) Inaccessible bar counter, (2) Improperly configured handrails.



**ADA Deficiency:** Misuse of potentially accessible bar counter.

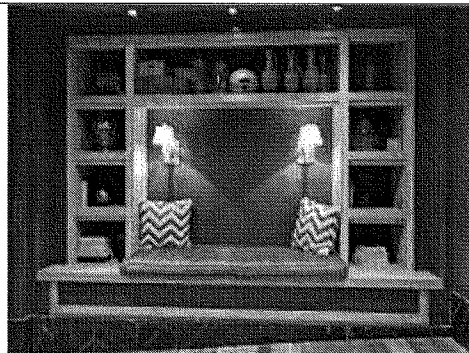




**ADA Deficiency:** Non-compliant bathroom.

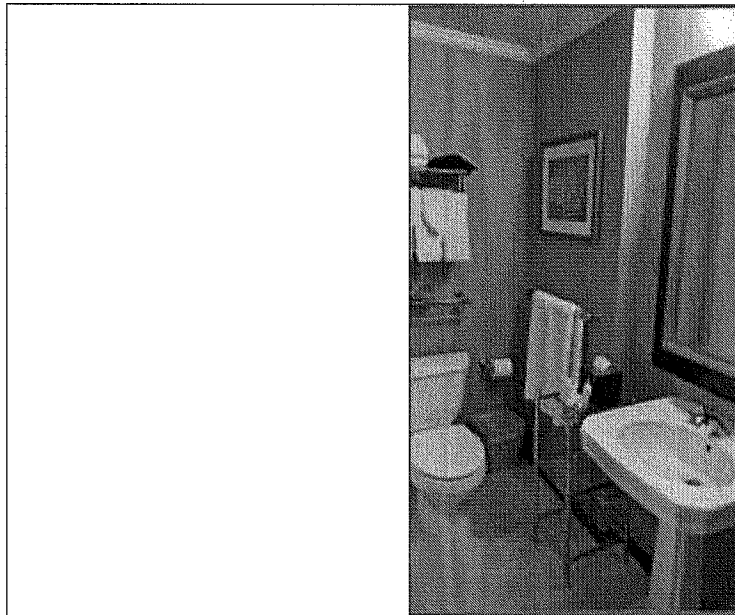


**ADA Deficiency:** Inaccessible snack counter.



**ADA Deficiency:** Apparent ramp not supported by handrails.

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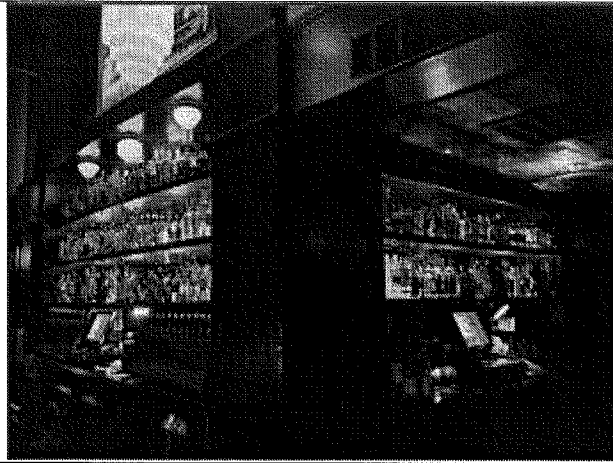
**ADA Deficiency:** Non-compliant bathroom.



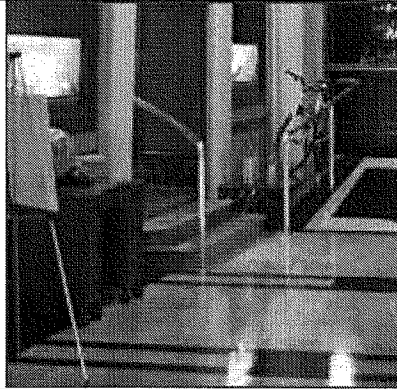
**ADA Deficiency:** Non-compliant bathroom.



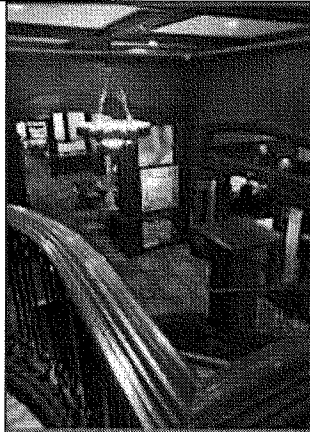
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**ADA Deficiency:** Non-compliant bar counter.

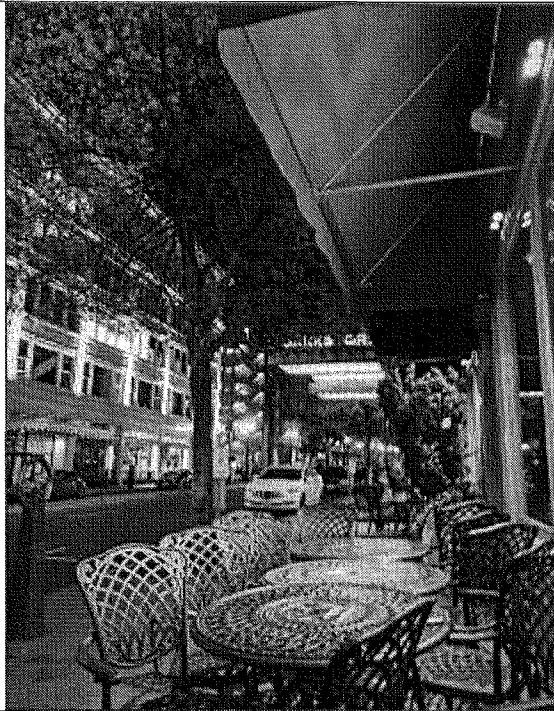


**ADA Deficiency:** (1) Stairs on accessible route, (2) Improperly configured handrails.



**ADA Deficiency:** (1) Stairs on accessible route, (2) Improperly configured handrails.

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**ADA Deficiency:** Inaccessible outdoor seating area.



**ADA Deficiency:** Non-compliant snack bar.



**ADA Deficiency:** Inaccessible to go counter.





**ADA Deficiency:** (1) Inaccessible bar, (2) Inaccessible tables, (3) Inaccessible bar against window, (4) Inaccessible route (stairs) and (5) Improper handrail configuration.



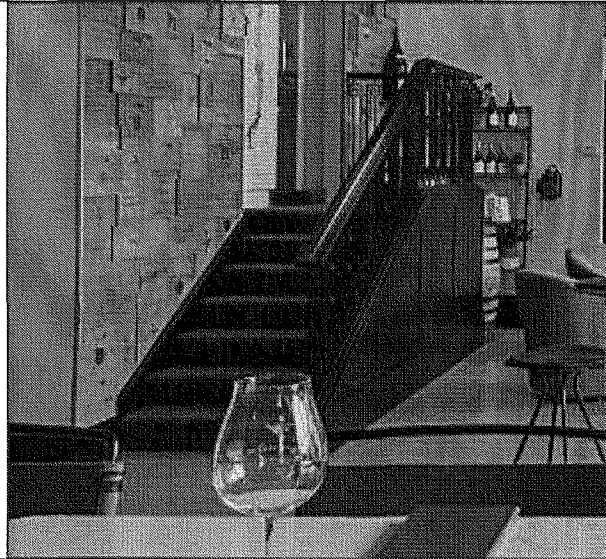
**ADA Deficiency:** Peephole too high.



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**ADA Deficiency:** Stairwell handrails improperly configured.



**ADA Deficiency:** Stairs on accessible route with no visible direction to alternate route.

**END**